



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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July 10, 2025

**VIA ECF**

Honorable Jesse M. Furman  
United States District Judge  
Southern District of New York  
40 Foley Square  
New York, New York 10007

Re: *Jessica Brenner v. City of New York, et. al.*  
24-CV-6949 (JMF)

Your Honor:

I am a Senior Counsel in the Office of Muriel Goode-Trufant, Corporation Counsel of the City of New York. On behalf of Defendant City of New York, I write in response to Plaintiff's July 10, 2025 application for a pre-motion conference and to respectfully request, until July 25, 2025, for Defendant City to respond to Plaintiff's document demands. Plaintiff's counsel, Leo Glickman, does not consent to this request.

As Your Honor is aware, earlier today Plaintiff requested a pre-motion conference to compel Defendant City to respond to Plaintiff's document demands, which according to Plaintiff's counsel's and prior City defense counsel's agreement were due on July 3, 2025. *See* Docket Entry No. 55. Defendant City now seeks additional time, until July 25, 2025, to respond to Plaintiff's discovery demands because the attorney initially handling this matter on behalf of the City, Mariam Khan, left the office on July 3, 2025 and therefore, this case is currently in the process of being reassigned to another Assistant Corporation Counsel. To that end, once a new attorney is assigned to this case, they will need time to quickly familiarize themselves with the case, prepare the responses and serve them on Plaintiff. This office sincerely apologizes for any delay this has caused.

For the reasons set forth above, Defendant City of New York respectfully requests until July 25, 2025 for Defendant City to respond to Plaintiff's document demands. Defendant City thanks the Court for its consideration of the instant application.

Respectfully submitted,

/s/ Alexandra Corsi  
Alexandra Corsi  
Senior Counsel

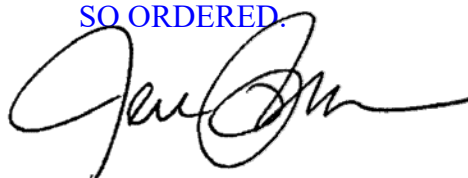
To: **VIA ECF**  
Leo Glickman, Esq  
*Attorney for Plaintiff*

John Burns, Esq.  
*Attorney for co-defendant CO Martin*

The Court grants - but only grudgingly - the City until July 25, 2025, to respond to Plaintiff's document demands. The City is cautioned that that deadline will not be extended further and that failure to comply with it will result in sanctions. Moreover, the City must do better going forward - not only in complying with its deadlines, but also in responding in a timely fashion to communications from Plaintiff's counsel. That is true even if there is further staff turnover.

The Clerk of Court is directed to terminate ECF No. 55.

SO ORDERED.

A handwritten signature in black ink, appearing to be "Jen [unclear]", is written over the "SO ORDERED." text.

July 14, 2025